

Update on Implementation Progress:
Housing at Risk: An Investigation into the Toronto Community Housing Corporation’s Eviction of Seniors on the Basis of Rent Arrears

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Summary

In June 2013, the Office of the Ombudsman, City of Toronto, released the findings of an investigation into the eviction of seniors for rent arrears at Toronto Community Housing. Toronto Community Housing accepted all 30 recommendations made in the report and committed to implementing them within the timeframes outlined by the Ombudsman. This report provides an update on the progress of implementation to date and next steps.

Background

Over 26,000 seniors (age 59+) live in Toronto Community Housing. 75% of them live alone. The number of senior residents at Toronto Community Housing is projected to grow by 35% by 2020. Age is not necessarily an indicator of vulnerability, but where age intersects with challenges like social isolation, mental health issues and language and literacy barriers, it can intensify vulnerability. Existing vulnerability is heightened when a tenancy is at risk due to arrears or a failure to return the document required to retain eligibility for rent-geared-to-income (RGI) subsidy.

Toronto Community Housing is committed to ensuring equitable customer service to residents with complex needs or circumstances. The implementation of the Ombudsman's recommendations is aligned with Toronto Community Housing's commitment to improving service to residents experiencing vulnerability. In our 2013-2015 Strategic Plan, we committed to developing 10 partnerships in high-needs buildings to provide housing supports for residents and to connecting 600 residents at risk to services that support housing stability. The Resident and Community Services division is leading this work with support from Asset Management and other divisions.

In June 2013, the Toronto Community Housing Board of Directors approved the creation of the Office of the Commissioner of Housing Equity, as recommended in the LeSage report and moved by Toronto City Council at the June 6, 2013 meeting. The Office of the Commissioner of Housing Equity is independent of the management of Toronto Community Housing and reports directly to the Board of Directors. The initial mandate of the Office is to review all files of seniors and vulnerable residents facing a loss of rent-geared-to-income subsidy or eviction for arrears.

The purpose of the reviews is to ensure that Toronto Community Housing staff and contracted companies conform to all Toronto Community Housing policies and procedures related to evictions and loss of subsidy for seniors and other vulnerable residents. In addition to providing oversight and supporting effective eviction prevention, the Commissioner's office will provide feedback to inform continuous improvement of Toronto Community Housing's arrears collection and income verification processes.

Approach to implementation of the recommendations

In June 2013, Toronto Community Housing established the Ombudsman Task Force to coordinate and oversee the implementation of the recommendations. The Task Force was comprised of staff from two City Divisions (Shelter, Support and Housing Administration and Social Development, Finance and Administration) and ten Toronto Community Housing

Divisions (Business Efficiencies, Diversity, Fairness & Human Rights, Information Technology Services (ITS), Learning & Organizational Development, Legal Services, Operations, Program Services, Resident and Community Services, Strategic Communications and Strategic Planning & Stakeholder Relations).

The Task Force reviewed business processes related to eviction on the basis of rent arrears with a focus on how those processes impact older residents. This work was guided by the need to update key business processes like arrears collection to ensure consistency and fairness across Toronto Community Housing's 13 Operating Units ('OUs') and four contract managed portfolios. Draft processes and supporting documents were shared with the Ombudsman's office as they were created. Feedback from the Ombudsman's office was incorporated into the final versions.

Substantial progress has been made to date in developing business processes, improving IT systems and developing staff training. We recognize that this work is only the initial phase in organizational improvement. Implementing the changes and sustaining them with a robust management framework is imperative to realize the full value of the recommendations made in the *Housing at Risk* report.

In January 2014, a steering committee of staff from Asset Management, Resident & Community Services, ITS, Strategic Communications and Strategic Planning & Stakeholder Relations took over the implementation of the work developed in 2013. The steering committee monitors and supports operational sub-committees assigned ownership of specific change management projects. Critical paths for each initiative are managed through defined milestones and the steering committee intervenes to address any challenges. A staff member has been assigned full-time to project manage the implementation until 2015.

Deliverables are reflected in divisional work plans and in the 2014 performance management plans of individual managers and management/exempt employees. Directors and Operating Unit Managers in Asset Management are being held directly accountable for the implementation's success.

The full impact of the new processes will not be felt until staff training is completed. Training will take place from April to June 2014. It will be followed by monitoring and performance management to ensure staff compliance and consistency across both the direct and contract managed portfolio.

In addition to making internal improvements, Toronto Community Housing has formed partnerships with several organizations and levels of government as a result of the implementation of the recommendations. Implementation work for the partnerships, listed in the table below, is ongoing and will continue throughout 2014 and into 2015 in most cases.

Partnerships

Partner(s)	Partnership details
Toronto Employment and Social Services	Information-sharing agreement to provide coordinated support to Ontario Works clients facing eviction for arrears or loss of RGI subsidy
City of Toronto Shelter,	Support for business process improvements, including

Support and Housing Administration	simplification of income verification reporting requirements for seniors on fixed incomes Sharing of best practices in supporting vulnerable clients with Hostel Services
Ontario Public Guardian & Trustee	In discussions to ensure that in eviction cases where the resident's capacity and capability may be at issue that Toronto Community Housing is able to make full use of all supports offered by the Ontario Public Guardian & Trustee.
Centre for Addiction and Mental Health (CAMH)	Consulting partnership to gather best practices in supporting residents with mental health and substance use issues to incorporate into staff training on vulnerability
Canada Revenue Agency, Ministry of Finance, and City of Toronto Shelter, Support and Housing Administration	Pilot project to provide automated income verification for seniors on fixed incomes with RGI subsidies living in Toronto Community Housing (and potentially other Toronto housing providers)
Ottawa Community Housing	Program evaluation partnership to develop best practices in biennial income verification for residents on fixed incomes
Toronto Central Local Health Integration Network (TCLHIN)	Expanded pilot project to improve the housing stability of residents by attaching individuals with complex health care needs to primary care, mental health and substance use issues.

Upcoming implementation milestones

April

- Office of the Commissioner of Housing Equity begins reviewing arrears eviction files and loss of subsidy cases among seniors and vulnerable residents (recommendations 11 and 26)
- Financial management workshops for seniors turning 65 (recommendations 6 & 7)
- New process auditors hired (recommendations 11, 23, 24, 25)
- Guideline for identifying vulnerability completed (recommendation 19)

May

- Training for staff on Arrears Collection Process and repayment plan guidelines, including procedures for integrated team meetings and the role of Community Service Coordinators in the process (recommendations 12 and 19)
- Documentation standards training for staff (recommendation 17)
- Turning 65 process training for Asset Management staff (recommendations 6 and 7)
- Process audit team begins work (recommendations 11, 23, 24, 25)
- New agency posters up in buildings (recommendation 3)
- Turning 65 information posters up in buildings (recommendations 6 and 7)

June

- Training for recommendations 12, 17 and 19 continues
- Training for front-line staff on identifying and responding to vulnerability begins (recommendation 19)
- New resident handbook distributed to residents (supporting implementation of recommendations 3, 6, 7)

Conclusion

Toronto Community Housing is devoting sustained resources and support to this implementation throughout 2014 and into 2015. Staff will continue to draw on the advice of the Ombudsman, the Commissioner of Housing Equity, City divisions, other housing providers, and resident groups as we move forward.

There will be a continual focus on ensuring consistent application of the revised processes. Standard operating practices introduced as a result of this work will help address long-standing inconsistencies between the local Operating Units and contract management companies and enable better support for process compliance. Emerging issues, including non-compliance, will inform continuous improvements. The Office of The Commissioner of Housing Equity will help strengthen eviction prevention practices and standards by examining how staff are applying policies and processes in cases involving seniors and vulnerable residents.

New processes will be accompanied by changes in performance management for front-line staff. Instead of focusing on outcome-based metrics such as arrears amounts, staff will be evaluated on their process compliance and success in achieving resolutions to arrears cases. These changes will help motivate staff to invest efforts in preserving tenancies by developing viable solutions tailored to each resident's situation.

New processes and approaches to performance management emerging from the implementation of the Ombudsman's recommendations are spurring major changes in the business objectives set for staff at all levels of the organization. Toronto Community Housing is committed to a robust change management initiative so that short and long-term improvements made in response to the Ombudsman's report are sustained by a successful shift in the corporation's culture to one that is more responsive and attuned to the needs of residents experiencing vulnerability.

Appendix: Work to date and next steps by recommendation

Recommendation	Work to date	Next steps
<p>1: TCH evaluate its current annual rent review practice, specifically:</p> <p>a) So that rent reviews and income verification for those tenants who meet the requirements of the Housing Services Act for rent reviews less often than annually, are not required to do so more frequently than every two years; and that;</p> <p>b) If such a recommendation cannot be fulfilled, a clear rationale is provided in writing to the Ombudsman's office with alternative ways to better support seniors in meeting the reporting requirements and that those ways are documented and disseminated broadly to ensure adherence by staff.</p>	<p>In progress.</p> <p>Staff evaluated the current rent review practice and assessed the feasibility of implementing a biennial review for seniors' households on fixed incomes. This work included best practice research and consultation with other Ontario housing providers. The findings indicated that the bi-annual review option reduces the administrative burden on residents but opens up the risk of increased retroactive arrears if residents do not report income changes between reviews. Reports of this issue were based on staff experience, not formal evaluation.</p> <p>Based on these findings, staff agreed with Ottawa Community Housing to conduct an evaluation of OCH's implementation of the biennial rent review process, which has been in place since 2009, and to pilot biennial reviews in ten Toronto Community Housing buildings with 3,800 senior residents on fixed incomes.</p>	<p>The evaluation of Ottawa Community Housing's implementation will be complete by the end of May 2014. Based on the findings, the pilot project will rolled out starting in June 2014. We will keep the Ombudsman informed of progress via the monthly update meetings.</p> <p>Lead: Hugh Lawson, Director, Strategic Planning & Stakeholder Relations</p>
<p>2: That the practice of returning the annual review package to a tenant when there is missing information cease immediately. The tenant should instead be advised what information is missing and asked to furnish it.</p>	<p>Completed.</p> <p>In June 2013, staff were instructed to stop returning incomplete annual review packages to residents. There is a template letter for staff to use to indicate which items are missing instead of returning the incomplete package. A reminder message was sent to staff in later in 2013. In March 2014, this directive was reinforced during face-to-face training with TSCs and their contract management equivalents on changes to</p>	<p>We will continue to monitor compliance with this directive via our complaints process and through the work of our process audit team.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>

Recommendation	Work to date	Next steps
	the City of Toronto RGI Guidelines.	
<p>3. That the outstanding Justice LeSage recommendations discussed in this report, and agreed to by TCHC, be implemented without further delay and no later than October 1, 2013 including but not limited to:</p> <p>c) Addressing the excessive volume of correspondence to tenants by reviewing all legal requirements and looking at viable alternatives that are user friendly, appropriate and non-threatening in their content.</p> <p>i. That in this regard, the information be accurate and written in Easy English in a manner that is accessible, easily understood, inviting and equitable in its approach</p> <p>ii. That legally required correspondence be written in language that is matter of fact and non-threatening in tone</p> <p>iii. That correspondence be preceded and followed up with personal contact wherever possible</p> <p>iv. That Justice LeSage's recommendation of more direct contact be construed minimally as telephone contact but preferably as personal visits and that correspondence to the tenant not be understood to mean personal contact</p> <p>d) Providing tenants with a receipt for the documents they submit in the annual review process.</p>	<p>Completed.</p> <p>Staff reviewed all arrears collection correspondence for plain language, clarity and tone. The letters were submitted to the Ombudsman's office for their feedback in August 2013, revised and then rolled out to staff on October 1, 2013.</p> <p>The definition of personal contact has been clarified as face-to-face or voice-to-voice (telephone) contact. The revised definition has been included in the eviction prevention guidelines.</p> <p>Staff created a new arrears collection process that requires attempts at personal contact after the initial late payment letter is sent, and before and after the N4 (Notice to terminate for arrears) is served.</p> <p>Residents who submit incomplete annual review packages receive a letter acknowledging receipt of the documents and indicating the items that are missing. Residents who submit complete annual review packages receive a Notice of Decision letter, which functions as the receipt.</p> <p>A poster with an up-to-date list of community agencies in the vicinity and contact information for TCH staff members responsible for support and community engagement, was posted in every TCH building by October 1, 2013. In communities without a central bulletin board, information was distributed door-to-door. These posters were intended to be the first iteration of</p>	<p>Staff in Resident and Community Services and Strategic Communications are developing the revised posters in April 2014 and distributing them to communities in May 2014.</p> <p>Leads:</p> <p>Mina Bahgat, Manager, Strategic Planning & Support, Resident and Community Services</p> <p>Bruce Malloch, Director, Strategic Communications</p> <p>TSCs and their contract management equivalents will receive training on the requirements for personal contact as part of the arrears collection process training in May and June 2014. Training for TSCs will come first, followed by training for contract management staff (their content must be modified to be compatible with their computer systems).</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>

Recommendation	Work to date	Next steps
<p>e) Posting in each tenant building an up-to-date list of community agencies that are within close proximity of the building. The list should be regularly updated, no less than every six months.</p>	<p>this project to capture feedback and gauge response from residents. They will be replaced with improved versions after six months.</p> <p>Staff received feedback on these posters from the Ombudsman’s office, notably that legal clinics should be included in the next version. Front-line staff have reported an increase in residents contacting them for support and community engagement as a result of the posters being put up.</p>	
<p>4: That template letters and related correspondence used by private property companies be brought in line with those used by TCHC to ensure consistency and similar treatment of its tenants.</p>	<p>Completed.</p> <p>In September 2013, The Manager of Contract Compliance and Delivery audited the use of the standardized letters by the contract management companies and found significant inconsistencies.</p> <p>In October 2013, Toronto Community Housing mandated the use of the letters revised by the Ombudsman’s office in accordance with recommendation 3. Two letters were required to be slightly modified due to differences in the computer systems used by contract management companies.</p>	<p>Property Administrators and Property Managers (equivalent to Tenant Service Coordinators and Operating Unit Managers, respectively) will be trained directly on the use of correspondence in arrears collection starting in May 2014.</p> <p>Compliance will be monitored via auditing by the process audit team in Program Services, who will monitor the performance of both TCH and contract management staff.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>5: That TCHC explicitly incorporate into its Seniors Framework an action plan for dealing with vulnerable seniors including but not limited to:</p> <p>a) Express recognition and promotion of equitable service to the increased vulnerability that exists when factors such as immigration, language, disability, diminished capacity, mental health, and sexual orientation intersect with the challenges of aging.</p>	<p>In progress.</p> <p>The implementation of TCH’s Seniors Implementation Framework 2008-2010 was integrated into the 2013 Toronto Seniors Strategy. Under new senior leadership in the Resident and Community Services Division in January 2014, TCH has begun developing a broader strategy on vulnerability.</p> <p>The Strategy will include a clear statement on TCH’s approach to vulnerability and will incorporate the City’s Guide to Good Practice. It</p>	<p>Staffing changes have delayed some aspects of the implementation of this recommendation. A new Director of Resident Access & Support joined in the organization in late December 2013. The Director is tasked with the development of an organization-wide strategy for supporting vulnerable seniors.</p> <p>The Director is working to establish a table of champions to guide the development of the strategy from a broad range of sectors including hospitals/health care, mental</p>

Recommendation	Work to date	Next steps
<p>b) That consultation take place as appropriate with staff responsible for working with vulnerable tenants, including those who may have mental health challenges</p> <p>c) That the role of the Community Services Coordinators and other staff responsible for mental health concerns be clearly articulated and used strategically and collaboratively.</p> <p>d) That staff with responsibility for addressing mental health concerns be included in team conferencing when concerns of mental health or cognitive impairment are at issue.</p> <p>e) That guidelines be developed and shared with staff surrounding the role and value of the Community Services Coordinators and other staff responsible for mental health.</p>	<p>will be integrated with efforts already underway on #19 to develop a staff training module that links enhanced awareness of vulnerability with customer service excellence.</p> <p>TCH staff are in discussion with the Ontario Public Guardian and Trustee and exploring other voluntary programs (e.g., Neighbourhood House Volunteer Housing Trusteeship Program) to ensure that all potential avenues of support to retain housing stability are exhausted and to ensure that residents facing eviction are supported by the right system of care.</p> <p>In addition, integrated team conferencing, including CSCs, is already taking place in many Operating Units. The new arrears collection process explicitly requires integrated team conferencing involving the TSC, CSC, Superintendent and Operating Unit Manager to support vulnerable residents in arrears before the L1 (application to evict) stage.</p>	<p>health and substance use (harm reduction), supportive housing, community leaders and advocates for elders and others. The table will be made up of thought leaders including Camille Orridge, CEO of the Toronto Central LHIN, Deputy Chief Peter Sloly of the Toronto Police Service and Dr. Catherine Zahn, President and CEO of CAMH. The Strategy will be completed by December 2014.</p> <p>Detailed procedures and a compliance monitoring framework for ensuring that integrated team meetings take place as part of the arrears collection process are under development and will be finalized in April and rolled out via training in May 2014. More detailed guidelines on the role and value of CSCs will be finalized in April and rolled out with the May training.</p> <p>Training on a guideline for identifying and responding to vulnerability will be delivered to staff in June 2014. The guideline and training will reinforce Toronto Community Housing's commitment to equitable service.</p> <p>Lead: Lenna Bradburn, Vice President, Resident and Community Services.</p>
<p>6: That TCHC address the issue of tenants' income changing when they become 65 through a public education program or some other mechanism, so that affected tenants are aware of the impact this may have on their RGI rent.</p>	<p>In progress.</p> <p>Staff developed a plan for holding financial management workshops for seniors in the buildings across the portfolio with the greatest numbers of residents turning 65 over the next four years. The workshops are based on a model developed by St Christopher House. Staff</p>	<p>In April 2014, posters will be distributed to all buildings and building workshops will begin. The workshops will continue until November 2014.</p> <p>Leads:</p> <ul style="list-style-type: none"> • Bruce Malloch, Director, Strategic Communications

Recommendation	Work to date	Next steps
	<p>are in discussions with St. Christopher House and two other agencies about a partnership to support delivery of the workshops.</p> <p>We created an informational poster for building bulletin boards and information for the revised resident handbook to support and reinforce the workshops and the business processes developed for recommendation 7.</p>	<ul style="list-style-type: none"> Lenna Bradburn, Vice President, Resident & Community Services
<p>7: That staff visit the tenants and provide them with a copy of the Old Age Security application and information about community agencies that could assist them in completing the form if required.</p>	<p>In progress.</p> <p>Staff developed a business process for notifying residents about the potential change in their income and rent and the process of applying for government assistance. Residents will receive a letter 9 months before their 65th birthday, followed by two phone call or door knock reminders from their TSC 8 months before their birthday and at the beginning of their birthday month.</p> <p>The Client Care Centre developed an additional business process to notify residents turning 65 when they call in with a maintenance or service request. A pop-up screen will notify the staff member to remind the resident to apply for government assistance and report the resulting income changes to their TSC.</p> <p>In March 2014, staff in the Client Care Centre received training on the new process and were provided with a list of Service Canada locations so that they can refer the resident to the nearest one. The process went live at the end of March.</p>	<p>In May and June 2014, Operating Unit staff and their contract management equivalents will receive training on the new TSC process.</p> <p>At the end of 2014, staff will evaluate the impact of the new processes on the number of seniors reporting their income change on time at age 65 and determine if further improvements to the process are required.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>8: That TCHC determine whether, in the case of retroactive arrears, it will enforce</p>	<p>In progress.</p>	<p>The repayment plan procedures will be rolled out to TCH and contract management</p>

Recommendation	Work to date	Next steps
<p>the practice of collecting a maximum of 10% of the tenant's RGI, each month, and that this be clearly spelled out in the Eviction Prevention Policy.</p>	<p>In September 2013, staff developed draft repayment plan procedures. The procedures state that in the case of a retroactive rent charge due to delays in obtaining monies from a government agency, residents may negotiate a repayment agreement set at an additional 10% of their monthly rent charge.</p> <p>In all other arrears repayment cases, the procedures do not specify a fixed repayment amount. This decision was based on analysis of current repayment agreements with seniors to determine the current average monthly repayment amounts being paid as a percentage of their RGI rent.</p> <p>The findings indicated that senior tenants are successfully paying more than 10% of their RGI rent in monthly payments. With repayment periods currently averaging 14 months, a reduction in the average monthly payment to 10% of RGI would extend that time to nearly 6 years.</p> <p>Based on these findings and the practices of other large housing providers, notably Ottawa Community Housing, staff decided to focus on repayment period length rather than setting a standard fixed repayment amount. This approach is intended to encourage the negotiation of agreements that take into account each tenant's individual circumstances.</p> <p>The procedures clearly state that repayment agreements can last as long as necessary to</p>	<p>staff via training beginning in May 2014.</p> <p>As part of the implementation of the procedures, staff are revising the key performance indicators (KPIs) used to evaluate TSC performance in addressing arrears. The intention is to distinguish between 'managed' and 'unmanaged' arrears when evaluating TSC performance. New KPIs will be implemented in the summer of 2014 following staff training on the arrears collection process.</p> <p>Managed arrears are ones where a repayment agreement is in place and the tenant is successfully making payments. Unmanaged arrears are ones where no repayment agreement is in place or the tenant has breached it. Staff performance will be assessed on their ability to increase managed arrears and reduce unmanaged arrears. This will encourage staff to negotiate realistic agreements that residents are able to successfully pay and will eliminate pressure on TSCs to negotiate shorter repayment agreements in order to improve their KPIs.</p> <p>A framework for management oversight of that includes management actions when agreements fail will help ensure that TSCs and contract management staff are consistently applying the procedures across the portfolio.</p> <p>Lead: Graham Leah, Vice President, Asset</p>

Recommendation	Work to date	Next steps
	<p>ensure that the resident is successful in repaying. They also provide a framework for strong oversight over repayment agreements by middle and senior management to ensure that residents and TSCs do not sign repayment agreements that the resident will not be able to abide by. The procedures support implementation and compliance with the Eviction Prevention Policy. A revised version of the repayment plan procedures was submitted in February 2014.</p>	<p>Management.</p>
<p>9: That amounts of arrears be properly calculated with plain language explanations of the figures and communicated to the tenant.</p>	<p>In progress.</p> <p>We resolved the system-driven calculation issues that were resulting in confusing, contradictory arrears figures through system changes to HMS in November 2012.</p> <p>Residents with more than three months of arrears receive an attachment with their N4 (Notice to Terminate) that is printed from the HMS system. It is in small print and is difficult to understand. We developed a cover sheet that explains how to read the printout.</p> <p>In January/February 2014, we received feedback on the draft cover sheet from the Ombudsman's office and the Tenant-Staff Communications Workgroup, a group of about 20 TCH residents who provide feedback on TCH communications products. In March 2014, we substantially revised the cover sheet in response to this feedback.</p>	<p>Once the cover sheet is reviewed again by the Tenant-Staff Communications Workgroup, it will be translated into multiple languages, printed and distributed to the Operating Unit offices for inclusion with N4s served for more than three months of arrears. It will be rolled out with the arrears collection process via staff training in May and June 2014.</p> <p>We are tracking the challenges with presenting arrears calculations clearly to residents and will use this information to inform the business requirements for our new IT system.</p> <p>Lead: Bruce Malloch, Director, Strategic Communications</p>
<p>10: That when tenant arrears first occur, early interventions are made by staff</p>	<p>In progress.</p> <p>The draft arrears collection process requires that</p>	<p>Training for direct and contract managed staff on the arrears collection process will begin in May 2014. Attempts at personal</p>

Recommendation	Work to date	Next steps
with personal visits wherever possible.	<p>personal contact be attempted via multiple channels before an N4 (Notice to Terminate) is served. Personal contact is defined as a successful phone call (not leaving a voicemail message), or a face-to-face conversation via door knocking, an arranged meeting, or the resident visiting the operating unit office. Staff must attempt to get in touch with the resident via telephone. If this is unsuccessful, they must door knock.</p>	<p>contact must be documented in accordance with the new documentation standards. Resident files will be audited for compliance to ensure that early interventions are taking place. The independent Commissioner of Housing Equity will also be verifying that early intervention has taken place before the files of seniors or vulnerable residents are forwarded to the Landlord and Tenant Board.</p> <p>Staff are evaluating the feasibility of making face-to-face contact with seniors and residents identified as vulnerable the initial step in the process, and will be reporting back to the Ombudsman on the results of this evaluation in April 2014.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
11: That staff ensure TCHC policies are in fact implemented in practice.	<p>In progress.</p> <p>To ensure that policies are followed in practice, we developed an arrears collection process that supports proper implementation of the policy by providing clarity on the steps staff must take in order to be compliant.</p> <p>In January 2014, Toronto Community Housing began holding mandatory monthly meetings at the business unit level to discuss policies and procedures and capture feedback, issues and questions from staff. As policies are reviewed and updated, they are be shared with all staff via these meetings.</p>	<p>Training on the arrears collection process, eviction prevention policy and repayment plan guidelines will take place in May 2014.</p> <p>To reinforce the training and monitor compliance, a new four-person process audit team will begin work in April/May 2014. They will be tasked with monitoring staff compliance with tenancy-related policies, procedures and business processes, including arrears collection and income verification. They will flag policy compliance issues with staff and managers and follow up to ensure action is taken to address them.</p>

Recommendation	Work to date	Next steps
		<p>The monthly policy training sessions will be used to inform all staff of policy changes resulting from the implementation of the <i>Housing at Risk</i> report.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>12: That TCHC develop an arrears collection process that includes repayment plan guidelines and provide a draft to the Ombudsman's office for review and comment by October 1, 2013</p>	<p>Completed.</p> <p>Staff developed a draft arrears collection process and repayment plan guidelines and submitted them to the Ombudsman's office for review and comment on October 2, 2013. Staff met with the Ombudsman's staff on October 25 to discuss the process and incorporated feedback from that meeting and successive communications from the Ombudsman's office in the final version.</p>	<p>Training for direct and contract managed staff on the arrears collection process and repayment plan guidelines will begin in May 2014.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>13: That eviction be a last resort and not a first resort.</p>	<p>In progress.</p> <p>Staff must complete a checklist documenting that all steps have been followed before submitting the file for approval to go to the L1 (application to evict) stage. Managers and Directors are both required to review and approve the checklist.</p> <p>Staff took this recommendation into consideration in developing the arrears collection process. All necessary steps, including documented attempts at personal contact, are required by the process before eviction can be pursued.</p>	<p>Staff compliance with each step in the arrears collection process will be audited by the process audit team in Program Services. Managers and staff will receive performance reports on files at different stages in the arrears collection process so that they can track process compliance.</p> <p>For seniors and vulnerable residents, the Commissioner of Housing Equity will provide an additional point of review to ensure that eviction is the last resort in an arrears situation.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>14: That the eviction processes for</p>	<p>In progress.</p>	<p>Staff training on the arrears collection</p>

Recommendation	Work to date	Next steps
<p>arrears are not used improperly for another purpose.</p>	<p>Staff took this recommendation into consideration In developing the arrears collection process.</p>	<p>process will be delivered in May 2014. The training will emphasize the importance of using the evictions for arrears process only for arrears cases, and not to manage other tenancy issues.</p> <p>Monitoring of staff compliance with the arrears collection process by the process audit team will help ensure that the process is not misused to evict a resident for other reasons. For seniors and vulnerable residents, the Commissioner of Housing Equity will provide an additional point of review to ensure that the evictions for arrears process is not misused to try to expedite an eviction for cause.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>15: That a guideline be developed to instruct staff and set standards for the type of information to be included in tenant files.</p>	<p>Completed.</p> <p>We developed a documentation guideline that instruct staff in the types of information to be included in resident files and the appropriate location and method for recording them in digital and paper records. It was submitted to the Ombudsman's office in December 2013.</p>	<p>Training on documentation standards will take place in May and June 2014.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>16: That all information in tenant files be entered objectively and without personal comment.</p>	<p>In progress.</p> <p>Staff developed a documentation guideline that requires that all information be entered objectively and without personal comment.</p>	<p>After training is complete, resident files will be audited by the process audit team to ensure compliance.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>17: That training be required in standards and content for documentation and record-keeping by</p>	<p>On track to be completed on time.</p> <p>Training materials have been developed based</p>	<p>The training on documentation standards will be delivered to direct and contract management staff (TSCs, OUMs and their</p>

Recommendation	Work to date	Next steps
May 30, 2014.	on the new documentation guideline.	contract management equivalents) in May and June 2014. Lead: Rahim Moledina, Director, Learning & Organizational Development.
18: That emergency contacts for tenants be kept on file and up to date, wherever possible and to the best of TCHC's ability.	<p>Completed.</p> <p>We examined the possibility of IT changes to make it mandatory to enter the emergency contact into a resident's digital file during the annual review process. This is intended to prevent the situation where the emergency contact is provided by the resident on their annual review form but staff do not input it into their digital resident file. We learned that this is not possible in our current system. It will be tracked as a business requirement for the new computer system.</p> <p>In response to this finding, we revised the annual review process to make it clearer that input of the emergency contact is mandatory.</p> <p>In addition, we developed a business process for the Client Care Centre to prompt senior residents to update their emergency contact when they call in with a maintenance or service request. When a resident calls, a pop-up screen will appear if their emergency contact is missing from their file or has not been updated in over a year, prompting the staff person to discuss this with the resident. The process was submitted to the Ombudsman's office for review on December 9, 2014.</p>	<p>The emergency contact reminder process in the Client Care Centre will go live in May 2014.</p> <p>Staff will be trained on the requirement to input the emergency contact into a resident's file during the annual review process. Compliance will be monitored through auditing of resident files by the process audit team.</p> <p>Leads:</p> <p>Graham Leah, Vice President, Asset Management.</p> <p>Gary Yorke, Director, Vendor Management Quality and Performance (responsible for the Client Care Centre)</p>
19: That training with respect to	In progress.	Staff are meeting with the City's Director of Organizational Development on April 4 to

Recommendation	Work to date	Next steps
<p>vulnerable seniors be implemented by:</p> <p>a) Developing a guideline to identify indicators of distress, diminished capacity or cognitive impairment to assist staff in assessing the need for intervention with vulnerable seniors.</p> <p>b) Training staff by June 30, 2014 to recognize signs of distress and engage in appropriate responses and interventions.</p> <p>c) That a training program be put in place to ensure employees are skilled and able to meet the needs of vulnerable seniors, and that such training be completed by June 30, 2014 for all staff serving vulnerable seniors.</p> <p>d) Requiring TCHC employees to participate in the City of Toronto's e-learning tutorial on "A Guide to Good Practice: Providing Equitable Service to Individuals of all Abilities".</p>	<p>Staff have reviewed existing documents including the 2009 Vulnerable Tenant Protocol to identify elements to be updated and included in a guideline for identifying indicators of distress among vulnerable residents, including seniors.</p>	<p>confirm how the soon to be finalized City of Toronto e-learning will be incorporated into the training delivered to TCH staff.</p> <p>The guideline will be finalized in April 2014 and training will be delivered in June 2014.</p> <p>Lead:</p> <p>Lenna Bradburn, Vice President, Resident and Community Services</p>
<p>20. That a protocol be explored with the Ontario Public Guardian and Trustee in cases where its intervention may be useful and required.</p>	<p>In progress.</p> <p>In December 2013, Toronto Community Housing's Director of Resident Access and Support met with the Director of Client Services at the Office of the Public Guardian and Trustee to discuss how to make full use of all supports offered by the Ontario Public Guardian & Trustee in eviction cases where the resident's capacity and capability may be at issue.</p>	<p>A follow-up meeting will take place on April 8, 2014.</p> <p>Lead: Lenna Bradburn, Vice President, Resident and Community Services</p>
<p>21: That TCH pursue initiatives, similar to the LOFT Pathways pilot project, to advocate for funding to provide</p>	<p>Completed.</p> <p>TCH worked in partnership with the Toronto</p>	<p>The Resident and Community Services division continues to work with the TCLHIN and other agencies and funders to expand</p>

Recommendation	Work to date	Next steps
<p>additional supports to tenants.</p>	<p>Central Local Health Integration Network (TCLHIN) to expand a pilot project to improve the housing stability of residents by attaching individuals with complex health care needs to primary care, mental health and substance use issues. The project has been expanded from one building to four buildings. TCH staff work closely with the project partners to coordinate support for residents that need it as well as to provide community development opportunities and activities.</p>	<p>funding for additional supports. This work is as part of their divisional business plan and commitments in <i>Homeward 2016</i>, Toronto Community Housing's 2013-2015 Strategic Plan.</p> <p>Lead: Lenna Bradburn, Vice President, Resident and Community Services</p>
<p>22: That a consulting relationship be established with the Centre for Addiction and Mental Health, or a comparable organization, to enable the sharing of best practices and professional advice for staff of TCHC.</p>	<p>In progress.</p> <p>Staff from Toronto Community Housing and CAMH have met to discuss how best practices from CAMH can be integrated into training for front-line staff on interacting with residents experiencing vulnerability.</p> <p>TCH is developing a Leadership Learning Table that includes CAMH, Toronto Public Health, Fred Victor, Houselink, Dixon Hall, Mount Sinai Hospital, St. Michael's Centre for Research on Inner City Health and the Toronto Central LHIN. The table will:</p> <ul style="list-style-type: none"> • Function as a situation table to consult on and problem-solve anonymized complex cases to improve individual health outcomes and housing stability • Share best practices and professional advice (e.g., trauma-informed care). A number of early adopters <p>Supportive housing provider Mainstay Housing and City of Toronto Hostel Services have also agreed to share best practices in working with</p>	<p>TCH is developing the mandate and membership of the Leadership Learning Table and expect the first meeting to take place by June 2014.</p> <p>Staff will be meeting with CAMH and with Mainstay and Hostel Services in April 2014 to confirm the scope and objectives of the consulting relationship on best practices and possible training opportunities and will report back to the Ombudsman's office on April 23, 2014.</p> <p>Lead: Lenna Bradburn, Vice President, Resident & Community Services.</p>

Recommendation	Work to date	Next steps
	vulnerable residents with Toronto Community Housing staff.	
<p>23: That staff responsible for implementing and managing the Eviction Prevention Policy, the Arrears Collection Process and the Eviction Prevention Checklist be held accountable for their actions.</p>	<p>Ongoing.</p> <p>We have developed job specifications for three audit staff who would join our current operational process auditor to form a four-person team. Methods for monitoring compliance are built into the steps of the arrears collection process so that compliance issues can be flagged by the process audit team. Findings will be shared with managers responsible for the performance of Tenant Services Coordinators (TSCs).</p> <p>Managers will use the audit findings to assess staff performance issues, possible training needs, and to determine consequences for staff with recurring compliance issues.</p>	<p>The job descriptions for the process auditors will be posted by April 2014. The process audit team is intended to be fully staffed and operational by the end of May 2014 so that they can begin monitoring compliance with the arrears collection process after training on the process is completed.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>24: That senior management ensures documented expectations articulated through policies, procedures and guidelines are implemented in practice and routinely followed.</p>	<p>Ongoing.</p> <p>Staff have developed performance measures to monitor compliance with the business processes developed in response to the Housing at Risk report.</p> <p>The mandatory eviction prevention checklist documents that all steps in the eviction prevention process have been followed. Managers and Directors are both required to review and approve the checklist before submitting the file for approval to go to the L1 (application to evict) stage.</p> <p>An additional mandatory checklist is required to document that all steps have been followed before an eviction order from the Landlord and</p>	<p>Starting in the fall of 2014, staff will provide quarterly reporting to the executive team based on the measures developed. Findings will inform decisions on performance management processes and policy changes.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>

Recommendation	Work to date	Next steps
<p>25: That meaningful consequence for failure to comply by staff is enforced through responsible management.</p>	<p>Tenant Board is fulfilled.</p> <p>Ongoing.</p> <p>In the period prior to April and May training, staff are receiving direction on how to correct mistakes made that result in non-compliance.</p>	<p>Operating Unit Managers and their contract management equivalents will be participating in the same training modules as the staff they manage so that they understand the processes that must be followed. Starting in June 2014, the process audit team will be providing them with reports to enable performance management of their staff.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>26: That any review conducted by staff that may precipitate penalties for the tenant up to and including eviction must be done thoroughly and objectively, without bias.</p>	<p>In progress.</p> <p>In November 2013, a small staff committee made up of the Director of Program Services, a non-OU manager and a manager from Housing Connections began conducting reviews of decisions to remove eligibility for RGI subsidy. No staff members from the operating units who may have been involved in the original decision are involved in the review.</p> <p>In November 2013, staff began attaching a new letter and review request form to all notices of decision regarding rent amounts or decisions to remove eligibility for RGI subsidy so that residents are aware of the option to request a review.</p>	<p>Starting in April 2014, the Commissioner of Housing Equity will provide an additional independent, unbiased review of all decisions to remove RGI subsidy from households with seniors or vulnerable members.</p> <p>Lead: Graham Leah, Vice President, Asset Management.</p>
<p>27: That systems access to federal Notices of Assessment from the Canadian Revenue Agency be explored.</p>	<p>Completed.</p> <p>We have partnered with the Canada Revenue Agency (CRA), the City of Toronto and the provincial Ministry of Finance to develop a pilot project for automated income verification for</p>	<p>The City of Toronto and Toronto Community Housing are currently developing a high-level project scope document for the pilot that will be shared with the Ministry of Finance to facilitate their</p>

Recommendation	Work to date	Next steps
	<p>seniors on fixed incomes.</p> <p>Current discussions are focused on determining which level of government would access the CRA data to do the rent-geared-to-income calculations.</p>	<p>internal approval process.</p> <p>Lead: Hugh Lawson, Director, Strategic Planning & Stakeholder Relations.</p>
<p>28: That unless otherwise specified, all recommendations be implemented no later than December 31, 2013</p>	<p>In progress.</p> <p>Two project managers (from Business Efficiencies and Strategic Planning & Stakeholder Relations) coordinated the work of the task force and ensured that individual leads met the deadlines they have been assigned.</p> <p>Where implementation timelines extend into 2014, this was discussed with the Ombudsman's staff at the progress meetings, and extensions were requested as required.</p>	<p>A project manager has been assigned to monitor the 2014 implementation of items developed by the task force in 2013.</p> <p>Lead: Hugh Lawson, Director, Strategic Planning & Stakeholder Relations.</p>
<p>29. That all written undertakings flowing from these recommendations be provided to my office in draft prior to TCHC staff dissemination.</p>	<p>Completed.</p> <p>All written documents emerging from the implementation of the recommendations were shared with the Ombudsman's office prior to being finalized and implemented, with the exception of the community agency posters (Recommendation 3), which were expedited in order to meet the October 1, 2013 deadline. The next version of the poster will be shared with the Ombudsman's office before being distributed.</p>	<p>Written documents will continue to be shared with the Ombudsman's office as they are finalized.</p> <p>Lead: Hugh Lawson, Director, Strategic Planning & Stakeholder Relations.</p>
<p>30. That quarterly updates be provided to my office by way of a face-to face meeting on the status of implementation.</p>	<p>Completed.</p> <p>The executive leads and project managers are meeting monthly with the Ombudsman's office.</p>	<p>Staff continue to meet with the Ombudsman's office on a monthly basis to provide progress updates.</p> <p>Lead: Hugh Lawson, Director, Strategic Planning & Stakeholder Relations.</p>



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